

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAULA DISBERRY

Plaintiff,

v.

EMPLOYEE RELATIONS COMMITTEE OF
THE COLGATE-PALMOLIVE COMPANY,
ALIGHT SOLUTIONS, LLC, AND THE BANK
OF NEW YORK MELLON CORPORATION,

Defendants.

Case No. 22-cv-05778-CM-OTW

DECLARATION OF ANJANIQUE M. WATT

Pursuant to 28 U.S.C. § 1746, Anjanique M. Watt, Esq. hereby declares:

1. I am a member of the Bar of this Court and an associate at the law firm Mayer Brown LLP, counsel for The Bank of New York Mellon (“BNY Mellon”). I respectfully submit this declaration in support of BNY Mellon’s Motion to Dismiss, dated September 15, 2022.

2. Attached hereto as Exhibit A is a true and complete copy of the Amended and Restated Defined Contribution Plan Master Trust Agreement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 15th day of September, 2022 in New York, New York.

/s/ Anjanique M. Watt
Anjanique M. Watt